

1 Gustavo Ponce, Esq.
2 Nevada Bar No. 15084
3 Mona Amini, Esq.
4 Nevada Bar No. 15381
5 **KAZEROUNI LAW GROUP, APC**
6 6787 W. Tropicana Ave., Suite 250
7 Las Vegas, Nevada 89103
8 Telephone: (800) 400-6808
9 Facsimile: (800) 520-5523
10 E-mail: gustavo@kazlg.com
11 E-mail: mona@kazlg.com

12 *Attorneys for Plaintiff,*
13 MARGARET MARTINEZ

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 MARGARET MARTINEZ, individually
17 and on behalf of all others similarly
18 situated,

19 vs. Plaintiff,
20 HOPE CREDIT, LLC,
21 Defendant.

22 Case No.: 2:23-cv-01003-BNW

23 **NOTICE OF ERRATA**
24 **REGARDING THE PARTIES JOINT**
25 **STIPULATION [ECF 19]**

26 **TO THE COURT AND TO ALL INTERESTED PARTIES AND THEIR**
27 **ATTORNEYS OF RECORD:**

28 PLEASE TAKE NOTICE that Plaintiff MARGARET MARTINEZ
("Plaintiff") hereby respectfully submits this Notice of Errata as to the Parties Joint
Stipulation [ECF 19] filed in the above-captioned matter on May 28, 2024. A correct
and accurate copy of Joint Stipulation is attached.

29 Dated: May 29, 2024

30 **KAZEROUNI LAW GROUP, APC**

31 BY: /s/ GUSTAVO PONCE
32 GUSTAVO PONCE, Esq.
33 Attorney For Plaintiff

1 Gustavo Ponce, Esq.
2 Nevada Bar No. 15084
3 Mona Amini, Esq.
4 Nevada Bar No. 15381
5 **KAZEROUNI LAW GROUP, APC**
6 6787 W. Tropicana Ave., Suite 250
7 Las Vegas, Nevada 89103
8 Telephone: (800) 400-6808
9 Facsimile: (800) 520-5523
10 E-mail: gustavo@kazlg.com
11 E-mail: mona@kazlg.com

12 *Attorneys for Plaintiff,*
13 MARGARET MARTINEZ

14
15 **UNITED STATES DISTRICT COURT**
16 **DISTRICT OF NEVADA**

17 MARGARET MARTINEZ, individually
18 and on behalf of all others similarly
19 situated,

20 vs. Plaintiff,
21 HOPE CREDIT, LLC,
22 Defendant.

23 Case No.: 2:23-cv-01003-BNW

24 **NOTICE OF ERRATA REGARDING THE**
25 **PARTIES JOINT STIPULATION [ECF 19]**

26 ////

27 ////

28 ////



1 Plaintiff MARGARET MARTINEZ (“Plaintiff”), and Defendant HOPE
2 CREDIT, LLC (“Defendant”) (the “Parties”) hereby jointly move to extend all
3 deadlines set forth in the Joint Stipulation and Order Extending Discovery Deadlines
4 filed with this Court on March 26, 2024 (ECF No. 17) by a period of ninety (90)
5 days.

6 The Parties have exchanged initial disclosures, have propounded discovery,
7 Defendant has responded to discovery, but strongly believe that this matter will need
8 more time to flush out the discovery issues and facts. The Parties anticipate review of
9 additional documents and recordings as well as depositions from multiple third-party
10 witnesses. Due to the nature of the facts here as well as the newly discovered
11 information provided by Defendant re its discovery responses, the Parties in good
12 faith believe more time is necessary to conduct efficient discovery and for the Parties
13 to have effective conversations without expanding needles resources at this moment,
14 until that is all flushed out.

15 1. On June 29, 2023, Plaintiff filed her Complaint (ECF No. 1), against
16 Defendant.

17 2. Defendant filed its Answer to Plaintiff’s Complaint on July 26, 2023
18 (ECF No. 6).

19 3. The Parties have completed the following discovery to date:

- 20 • The Parties have exchanged initial disclosures.
- 21 • Plaintiff served Defendant with a request for production of documents,
22 request for admissions, and interrogatories on February 9, 2024.
- 23 • Defendant served its responses to Plaintiff’s request for admission on
24 February 24, 2024. The parties are currently meeting and conferring
25 regarding Defendant’s responses.
- 26 • Defendant served its responses to Plaintiff’s request for production of
27 documents and interrogatories on March 6, 2024. The parties are
28 currently meeting and conferring regarding Defendant’s responses.



- Defendant served Plaintiff with a request for production of documents, request for admissions, and interrogatories on May 7, 2024.

3 4. The parties still need to conduct depositions, potentially additional
4 written discovery, serve subpoenas, conduct third-party depositions, and conduct
5 expert discovery.

6 5. The additional time will allow the Parties to conduct extensive and
7 additional fact discovery, including taking depositions, potentially additional written
8 discovery, acquiring all documents from third-parties, resolving pending discovery
9 issues, additional time to adequately determine whether expert discovery will be
10 needed in this matter, and flesh out a newly discovered information discrepancy.

11 6. No party will be prejudiced by this Court granting this Stipulation as all
12 Parties jointly seek an extension of these deadlines. Moreover, the Parties believe
13 that allowing the extension will serve the ends of judicial economy.

14 7. Moreover, the requested extensions are not sought for the purposes of
15 delay.

16 8. This is the Parties' second request to extend these deadlines.

17 9. Accordingly, the parties request adoption of the following deadlines:

a. Discovery Plan:

Discovery Cut-off	1/27/2025
Deadline to Disclose Expert Disclosures	09/30/2024
Deadline to Disclose Rebuttal Expert Disclosures	10/29/2024
Deadline for Class Certification	10/29/2024
Deadline to File Dispositive Motions	02/25/2025

1 WHEREFORE, Plaintiff and Defendant respectfully request this Honorable
2 Court (1) extend discovery in the present matter as set forth above; and (2) reissue a
3 new Scheduling Order to reflect the requested extension.

4

5 Dated this 29th day of May 2024.

6

7 **KAZEROUNI LAW GROUP, APC**

8

9 By: /s/ Gustavo Ponce
10 Gustavo Ponce, Esq.
11 Mona Amini, Esq.
12 6787 W. Tropicana Ave., Suite 250
13 Las Vegas, Nevada 89103
14 *Attorneys for Plaintiff*

15 **CORY READE DOWS & SHAFFER**

16

17 By: /s/ Christopher Reade
18 R. Christopher Reade, Esq.
19 Rowland Graff, Esq.
20 1333 North Buffalo Drive, Suite 210
21 Las Vegas, Nevada 89128
22 *Attorneys for Defendant*
23 *Consortium Corporation d/b/a Hope*
24 *Credit LLC*

25 **ORDER**

26

27 IT IS SO ORDERED.

28

29

30 
31 Hon. L. Steven Weisberg
32 UNITED STATES MAGISTRATE JUDGE

33

34 DATED: 5/29/2024

35

36

37

38

39

40

41

42

43

44

45

46

47

48

49

50

51

52

53

54

55

56

57

58

59

60

61

62

63

64

65

66

67

68

69

70

71

72

73

74

75

76

77

78

79

80

81

82

83

84

85

86

87

88

89

90

91

92

93

94

95

96

97

98

99

100

CERTIFICATION OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on May 29, 2024, the foregoing JOINT STIPULATION AND ORDER EXTENDING DISCOVERY DEADLINES was served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: /s/ Gustavo Ponce

Gustavo Ponce, Esq.

Mona Amini, Esq.

6787 W. Tropicana Ave., Suite 250
Las Vegas, NV 89103

